

Eric A. Liepins
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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE

ARUBA PETROLEUM, INC.

DEBTOR

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Case no.16-42121 -11

MOTION FOR SETTING AND REQUEST FOR EMERGENCY HEARING ON MOTION
FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Aruba Petroleum, Inc. ("Debtor") and files this its Request for Emergency Hearings on the Debtor's Motion for Relief From Automatic Stay.

The Debtor operates an Oil & Gas Company.. As a result of a customer not paying its invoices to the Debtor, the Debtor became delinquent on its payments to creditors. The Debtor is current the appellant in a state court litigation matter. This appeal is critical to the Debtor in that the Debtor has posted a \$2,300,000 cash bond. A favorable ruling will provide the estate with \$2,300,000 in funds to pay its creditors. The matter has already been argued and is awaiting a ruling. Debtor seeks an expedited hearing on before December 2, 2016.

Respectfully submitted,

_____/s/ Eric Liepins_____
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PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy or mail to Micheal Mazzone 2121 McKinney, Suite 2100, Houston Texas and Ben Barron 4516 Lover Lane, Suite 280, Dallas, Texas 75225 as counsel for Arbua Petroleum, Inc. And on Counsel For Lisa Parr, Richard Capshaw, 3101 Allen Street, Suite 201, Dallas, Texas 75204 David Matthes, 2905 Sackett Street, Houston, Texas 77098 and Bradford Gilde, 55 Waugh Suite 850, Houston Texas 77007 via e-mail or United States mail on the 29th day of November 2016.

_____/s/ Eric Liepins_____
Eric A. Liepins

UNSWORN DECLARATION OF ERIC A. LIEPINS IN SUPPORT OF DEBTOR'S
EMERGENCY MOTION TO USE CASH COLLATERAL

1. My name is Eric A. Liepins. I submit this Declaration in support of the Debtor's Motion to Use cash Collateral. I am over the age of 21 years and of sound mind. I have personal knowledge of all facts set forth herein, and they are true and correct.
2. I am an attorney licensed to practice in the State of Texas since 1987 and admitted in the United States District and Bankruptcy Courts for the Eastern District of Texas.
3. On November 21, 2016 I filed of a Chapter 11 Bankruptcy Proceeding of Aruba

Petroleum, Inc.

4. The Debtor desires to complete an appeal of certain state court litigation. A successful result would provide the estate with \$2,300,000.
5. Copies of the Motion and this emergency request were sent via telecopier to all counsel involved in the state court litigation on November 29, 2016.

____/s/ Eric Liepins_____
Eric Liepins